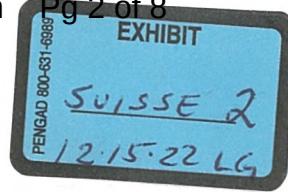


Exhibit 3



UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	Chapter 15
FAIRFIELD SENTRY LIMITED, et al., <u>Debtors in Foreign Proceedings.</u>	Case No. 10-13164 (CGM) Jointly Administered
FAIRFIELD SENTRY LIMITED (IN LIQUIDATION), et al., Plaintiffs, – against –	Adv. Pro. No. 10-03496 (CGM) Administratively Consolidated
THEODOOR GGC AMSTERDAM, et al., Defendants.	
FAIRFIELD SENTRY LIMITED (IN LIQUIDATION) et al., Plaintiffs, v.	Adv. Pro. No. 10-03635 (CGM)
ABN AMRO SCHWEIZ AG, et al., Defendants.	

BNP PARIBAS DEFENDANTS'
SUPPLEMENTAL RESPONSES AND OBJECTIONS TO THE PLAINTIFFS'
FIRST SET OF INTERROGATORIES TO THE BNP PARIBAS DEFENDANTS

Pursuant to Rule 26 and Rule 33 of the Federal Rules of Civil Procedure (the “Federal Rules”), as incorporated through Rule 7026 and Rule 7033 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), BNP Paribas (Suisse) SA, BNP Paribas (Suisse) SA Ex Fortis and BNP Paribas (Suisse) SA Private (the “BNP Paribas Defendants”), by their undersigned attorneys Cleary Gottlieb Steen & Hamilton LLP, make the following supplemental objections and responses (the “Supplemental Response”) to the Plaintiffs’ First Set

of Interrogatories to the BNP Paribas Defendants (the “Interrogatories”),¹ issued by Kenneth M. Krys and Greig Mitchell (the “Liquidators”), in their capacities as the duly appointed liquidators and foreign representatives of Fairfield Sentry Limited (In Liquidation) (“Sentry”), Fairfield Sigma Limited (In Liquidation) (“Sigma”) and Fairfield Lambda Limited (In Liquidation) (“Lambda” and together with Sentry and Sigma, the “Funds”) in connection with the proceedings captioned *Fairfield Sentry Limited (In Liquidation) v. ABN Amro Schweiz AG*, Adv. Pro. No. 10-03635 (Bankr. S.D.N.Y.) (the “Action”).

INCORPORATION BY REFERENCE

1. The BNP Paribas Defendants incorporate by reference the Reservation of Rights, General Objections, Objections to Every Interrogatory as Premature, Objections to Definitions, Objections to Instructions and Objections to Relevant Time Periods as well as every objection made to each specific interrogatory contained in their First Response to Plaintiff’s First Set of Interrogatories, dated November 1, 2021 (collectively, the “Existing Objections”), as if set forth in full herein.

2. For the avoidance of doubt, the BNP Paribas Defendants expressly reserve the right to amend, supplement or withdraw this Supplemental Response.

FURTHER SPECIFIC RESPONSES AND OBJECTIONS TO
INTERROGATORIES

Interrogatory No. 1:

For the period January 1, 1990 to December 31, 2008, identify all Persons involved in any written or oral Communications concerning using a U.S. correspondent bank for Your use in redeeming shares from Sentry, including any Beneficial Shareholders.

¹ Unless otherwise set forth herein, including but not limited to the objections in the First Response to Plaintiff’s First Set of Interrogatories, the BNP Paribas Defendants adopt the Definitions provided in the Interrogatories. Although the Liquidators issued one omnibus set of Interrogatories, this supplemental response is provided on behalf of the BNP Paribas Defendants and does not address any Interrogatory addressed solely to entities in other proceedings.

Response to Interrogatory No. 1:

The BNP Paribas Defendants expressly reassert each of the Existing Objections, including as previously lodged in response to Interrogatory No. 1. Subject to and without waiver of the foregoing, the BNP Paribas Defendants state as follows: Based on information available to date, the BNP Paribas Defendants have identified a list of current or former employees who may have been involved in the activities referenced in Interrogatory No. 1 (hereto attached as "Exhibit A").

Dated: May 31, 2022
New York, New York

CLEARY GOTTLIEB STEEN &
HAMILTON LLP

/s/ Lisa M. Schweitzer
Lisa M. Schweitzer
Ari D. MacKinnon
Thomas S. Kessler

One Liberty Plaza
New York, New York 10006
Telephone: (212) 225-2000

*Counsel for BNP Paribas (Suisse) SA,
BNP Paribas (Suisse) SA Ex Fortis,
BNP Paribas (Suisse) SA Private*

Exhibit A

Pseudonym	Generalized Job Title
Employee # 1	Client Relations Manager
Employee # 2	Client Relations Manager
Employee # 3	Manager
Employee # 4	Client Relations Manager
Employee # 5	Financial Manager
Employee # 6	Client Relations Manager
Employee # 7	Client Relations Manager
Employee # 8	Client Relations Manager
Employee # 9	Client Relations Manager
Employee # 10	Private Banker
Employee # 11	Client Relations Manager
Employee # 12	Private Banker / Investment Advisor
Employee # 13	Private Banker
Employee # 14	Trader
Employee # 15	Financial Manager
Employee # 16	Client Relations Manager
Employee # 17	Private Banker

Pseudonym	Generalized Job Title
Employee # 18	Private Banker
Employee # 19	Private Banker / Client Relations Manager
Employee # 20	Financial Manager
Employee # 21	Private Banker
Employee # 22	Private Banker
Employee # 23	Private Banker
Employee # 24	Private Banker / Client Relations Manager
Employee # 25	Client Relations Manager
Employee # 26	Client Relations Manager
Employee # 27	Private Banker / Client Relations Manager
Employee # 28	Client Relations Manager
Employee # 29	Private Banker / Client Relations Manager
Employee # 30	Client Relations Manager
Employee # 31	Private Banker

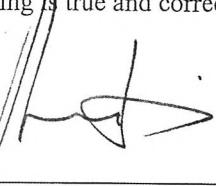


BNP PARIBAS

VERIFICATION

We, Andreas Nanni and Derek Grand, Head of Legal WM and Legal Counsel WM, in our capacity as duly authorized representatives of BNP Paribas (Suisse) SA verify that we have read the foregoing responses and Plaintiffs' First Set of Interrogatories and that the Statements contained therein to the extent they are based upon our personal knowledge are true and correct, and to the extent based upon information we have received from others, that we are reliably informed and believe them to be true and correct.

We verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


Andreas Nanni

Dated: May 30th, 2022


Derek Grand

Dated: May 30th, 2022